

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

---

February 9, 2009

TO: Internal File

THRU: Joe Helfrich, Lead *ph*

FROM: Peter Hess, En Sci III, Engineering / Bonding *PH by sas*

RE: 2007 Midterm Review, Energy West Mining Company, Trail Mountain Mine, C/015/009, Task ID # 2878

### SUMMARY:

The Division initiated a mid-term review of the Trail Mountain Mine mining and reclamation plan on November 15, 2007. Mining activities at this site were ceased and the site was placed in temporary cessation on May 2, 2001.

The current bond amount of \$ 1,254,000 was revised effective July 1, 2002, (2007 dollars).

### TECHNICAL ANALYSIS:

## OPERATION PLAN

## SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

---

**TECHNICAL MEMO**

---

**Analysis:****Performance Standards For Subsidence Control**

A review of the 2007 subsidence monitoring information for the Trail Mountain Mine permit area revealed the following; *"There has not been any secondary extraction at the Trail Mountain Mine since 2001. It is assumed that all areas which were undermined have reached maximum deformation and are stable (Please see previous annual reports). Due to a flaw discovered in collected data from the 2007 annual flyover, the Permittee has requested an extension of time from the Division to resolve / correct the data error. The Division granted the Permittee's request."*

**Findings:**

The Division cannot make any findings relative to the 2007 subsidence monitoring data at this time.

**RECLAMATION PLAN****BONDING AND INSURANCE REQUIREMENTS**

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

**Analysis:****Determination of Bond Amount**

As part of the Task ID # 2878 mid-term review, the Division re-calculated the amount of reclamation bond necessary to reclaim the Trail Mountain Mine site. This involved an update of unit costs. There have not been any new structures built at this site since it went into temporary cessation in 2001. No reclamation activities have occurred at the Trail Mountain site.

The current amount of posted bond is \$ 1,254,000 (2007 dollars).

The re-calculated amount of reclamation bond necessary to reclaim this site (2013 dollars) is \$ 1,354,000.

**TECHNICAL MEMO**

---

The Permittee must post an additional \$ 100,000 of bond to meet the requirements of R645-301-812.700.

**Findings:**

**R645-301-812.700:** The current posted bond amount is insufficient to reclaim the site.

The Permittee must post an additional \$ 100,000 of reclamation bond as a surety in order to meet the requirements of R645-301-812.700.

**RECOMMENDATIONS:**

The Division cannot approve / finalize the Task ID # 2878 application until the additional bond amount is posted.

O:\015009.TMT\FINAL\WG2878\PHH2878F.doc